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**VIA ECF**

April 17, 2025

Magistrate Judge Joseph A. Marutollo  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East Brooklyn, Courtroom: N324  
New York 11201

Re: **Loiacono et al v. Allied Partners Management LLC et al**  
Case No: 25-cv-00330

Dear Judge Marutollo:

I am the Pro Hac Vice counsel of record for Mr. Loiacono in the above-referenced case. Thank you for terminating and rescheduling the Initial Teleconference and the filing of the Discovery Plan. However, because the Defendants will be served today and possibly tomorrow, and they have 30 days to Answer or file a Response, I respectfully request that the new dates are continued to a date after the time in which Defendants are required to file a response. I believe that defense counsel will need more time to prepare a response and evaluate all the discovery that will be needed in this case, which I am expecting to be extensive from our perspective.

Therefore, I request that the new dates set today are continued as follows:

	<b><u>Current Deadline</u></b>	<b><u>Proposed Deadline</u></b>
1. Proposed Discovery Plan	May 14, 2025	May 28, 2025
2. Initial Telephonic Hearing	May 21, 2025	June 6, 2025

Lastly, I am a part-time disabled lawyer with a recognized disability of Lupus. I understand that the American's with Disabilities Act does not apply to federal courts. However, I humbly request that based on my disability note from my physician attached as Exhibit 1 that this court utilizes its discretionary authority to grant me a "reasonable accommodation" of adding 10 business days to any order issued by this court requiring the parties to respond to any deadline **not** covered by the Proposed Discovery Plan once issue. Regretfully, due to my limitations, I just cannot respond to orders in 5 days. Since my last hospitalization last March, which was the second in 6 months and the only two major hospitalizations I have had for my disease since 2021 and before, I just cannot move that fast and manage my disease. My body and mind, regretfully much slower now since these two last hospitalizations were tough.



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It is not my intention to protract litigation in any way. Due to my disability as outlined in my doctor's letter, intensive stress and pressure from last minute deadlines affect my ability to be effective. I am otherwise qualified to serve as co-counsel. I just need the reasonable accommodation of additional time to manage timely responses to any orders by the Court. I make this request upfront to avoid constant requests that become annoying. This request will be made to all defense counsel once they appear in this case; so that they also understand my legitimate need for this requested reasonable accommodation.

Thank you for your attention to these requests.

Respectfully Submitted,

/s/ Jo Saint-George, Esq.

Jo Saint-George, Esq.  
Chief Legal Officer

cc: Tricia L. Lindsay – Co-counsel

